

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION

Typhoon Touch Technologies, Inc.	§	
Nova Mobility Systems, Inc.	§	
	§	
v.	§	Case No. 6:07-cv-546-LED
	§	Jury Demanded
Dell, Inc.,	§	
Xplore Technologies Corporation	§	
Of America,	§	
Sand Dune Ventures, Inc.	§	
Fujitsu Computer Systems Corporation	§	
Toshiba America Information Systems, Inc.	§	
Lenovo (United States), Inc.	§	
Panasonic Corporation of North America	§	
Apple, Inc.	§	
HTC America, Inc.	§	
Palm, Inc.,	§	
Samsung Electronics America, Inc.,	§	
Nokia, Inc., and	§	
LG Electronics USA, Inc.	§	

**DEFENDANT SAND DUNE VENTURES, INC.'S RENEWED MOTION TO DISMISS
PLAINTIFFS' SECOND AMENDED COMPLAINT FOR PATENT
INFRINGEMENT FOR LACK OF SUBJECT MATTER JURISDICTION
DUE TO PLAINTIFFS' LACK OF STANDING**

COMES NOW Defendant, Sand Dune Ventures, Inc. ("Sand Dune"), by and through undersigned counsel and pursuant to Fed.R.Civ.P. 12(b)(1), and moves to dismiss Plaintiffs' Second Amended Complaint for Patent Infringement for lack of subject matter jurisdiction due to Plaintiffs' lack of standing and in support thereof, states as follows:

For the same reasons indicated in Sand Dune's Motion to Dismiss (D.E. # 51) and Reply in Support of Motion to Dismiss (D.E. #58), Plaintiffs' Second Amended Complaint should be dismissed for lack of subject matter jurisdiction due to Plaintiffs' lack of standing.

WHEREFORE, Defendant, Sand Dune Ventures, Inc., respectfully requests that this Court dismiss Plaintiffs' Second Amended Complaint with prejudice for lack of subject matter

jurisdiction due to Plaintiffs' lack of standing and such further relief the Court deems just and proper.

Dated: July 8, 2008

Respectfully submitted,

By: /s/ Michael E. Jones
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ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on July 8, 2008. Any other counsel of record will be served by First Class U.S. mail on this same date.

/s/ Michael E. Jones